

**IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF TEXAS  
MARSHALL DIVISION**

COMPRESSION LABS, INC.,

Plaintiff,

versus

1. AGFA, et al.

Defendants.

Civil Action  
No. 2:04-CV-158  
(Judge Folsom)

**MOTION FOR ENTRY OF PROTECTIVE ORDER**

TO THE HONORABLE JUDGE OF SAID COURT:

COME NOW, Plaintiff, Compression Labs, Incorporated and file this Motion for Entry of Protective Order and would show the Court as follows:

The plaintiff hereby requests the Court enter the Protective Order attached hereto as Exhibit A.

The Protective Order attached as Exhibit A was provided to Plaintiff by counsel for Defendant Apple Computer Incorporated, who indicated that all of the defendants have agreed. See Exhibit B. Counsel for Agfa Corporation, Apple Computer Incorporated, Eastman Kodak Company, Fuji Photo Film USA, Inc., Fujitsu Computer Products of America, Inc., JASC Software Inc., JVC Americas Corporation, Kyocera Wireless Corporation, Matsushita Electric Corporation of America, Mitsubishi Digital Electronics America Inc., Oce North America, Onkyo USA Corporation, Panasonic Communications Corporation of America, Panasonic Mobile Communications of

America and Thomson Inc. have expressly agreed to the entry of the protective order in the form attached as Exhibit A. The other parties have not responded to Plaintiff's request to file this motion as agreed. Plaintiffs, out of an abundance of caution, are filing this motion as opposed by the remaining defendants.

Wherefore the parties respectfully request that the Court grant this motion and enter the attached Protective Order attached hereto as Exhibit "A" and for such other and further relief as the parties may show themselves justly entitled.

Respectfully submitted,

Compression Labs, Inc.

By: Stephen G. Rudisill by permission S. Calvin Capshaw

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ATTORNEYS FOR PLAINTIFF

**CERTIFICATE OF CONFERENCE**

Plaintiff has attempted to confer with each defendant to ascertain whether each defendant agrees to or opposes this motion. Agfa Corporation, Apple Computer Incorporated, Eastman Kodak Company, Fuji Photo Film USA, Inc., Fujitsu Computer Products of America, Inc., JASC Software Inc., JVC Americas Corporation, Kyocera Wireless Corporation, Matsushita Electric Corporation of America, Mitsubishi Digital Electronics America Inc., Oce North America, Onkyo USA Corporation, Panasonic Communications Corporation of America, Panasonic Mobile Communications of America and Thomson, Inc. do not oppose this motion. Counsel for the other defendants have not responded to Plaintiff, and therefore Plaintiff cannot represent to the court their position.

/s/ S. Calvin Capshaw

**CERTIFICATE OF SERVICE**

I hereby certify that on this 28<sup>th</sup> day of October, 2004, a true and correct copy of the above and foregoing document was served by CM/ECF on the following counsel of record.

/s/S. Calvin Capshaw

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